UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

United States of America,

Plaintiff,

Case:2:21-cr-20508 Judge: Parker, Linda V. MJ: Altman, Kimberly G. Filed: 08-05-2021 At 03:17 PM INDI USA V. JOHNSON (DA)

v.

Kyle Lamont Johnson,

Defendant.

Violations: 18 U.S.C. § 922(a)(6) 18 U.S.C. § 1028A(a)(1)

INDICTMENT

THE GRAND JURY CHARGES:

Count One 18 U.S.C. § 922(a)(6) – False Statement to Acquire a Firearm

On or about June 28, 2021, in the Eastern District of Michigan, the defendant, Kyle Lamont Johnson, in connection with the attempted acquisition of two firearms, an FN model PS90 rifle and an IWI model Tavor X95 rifle, from Action Impact, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly furnished and exhibited a false, fictitious, and misrepresented identification to Action Impact, which identification was intended and likely to deceive Action Impact as to a fact material to the lawfulness of

such acquisition of firearms to Johnson under Chapter 44 of Title 18, in that Johnson represented that he was an individual with initials M.B., in violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

Count Two 18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft

On or about June 28, 2021, in the Eastern District of Michigan, the defendant, Kyle Lamont Johnson, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: making a false statement to acquire a firearm, in violation of 18 U.S.C. § 922(a)(6), knowing that the means of identification belonged to another actual person with initials M.B., in violation of 18 U.S.C. § 1028A(a)(1).

Count Three

18 U.S.C. § 922(a)(6) – False Statement to Acquire a Firearm

On or about June 23, 2021, in the Eastern District of Michigan, the defendant, Kyle Lamont Johnson, in connection with the attempted acquisition of two firearms, a Glock model 23 and a Glock model 29, from DeRonne Hardware, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly

furnished and exhibited a false, fictitious, and misrepresented identification to DeRonne Hardware, which identification was intended and likely to deceive DeRonne Hardware as to a fact material to the lawfulness of such acquisition of firearms to Johnson under Chapter 44 of Title 18, in that Johnson represented that he was an individual with initials D.M., in violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

Count Four 18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft

On or about June 23, 2021, in the Eastern District of Michigan, the defendant, Kyle Lamont Johnson, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: making a false statement to acquire a firearm, in violation of 18 U.S.C. § 922(a)(6), knowing that the means of identification belonged to another actual person with initials D.M., in violation of 18 U.S.C. § 1028A(a)(1).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Four of this

Indictment are hereby incorporated by reference for the purpose of

alleging forfeiture pursuant to the provisions of 18 U.S.C. § 924(d) together with 28 U.S.C. § 2461.

Upon conviction of the offenses set forth in Counts One and Three of this Indictment, the defendant shall forfeit to the United States any firearms or ammunition involved in or used in his knowing violations of 18 U.S.C. § 922(a)(6).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

BENJAMIN C. COATS Chief, Major Crimes Unit Assistant United States Attorney

s/Jessica V. Currie

JESSICA V. CURRIE (P74213) Assistant United States Attorney 211 West Fort Street, Suite 2001 Detroit, Michigan 48226 (313) 226-9531 Jessica.Currie@usdoj.gov

Dated: August 5, 2021

United States District Court Eastern District of Michigan	Criminal Case Cov	Case:2:21-cr-20508 Judge: Parker, Linda V. MJ: Altman, Kimberly G. Filed: 08-05-2021 At 03:17 PM
NOTE: It is the responsibility of the Assistant U.S.	Attorney signing this form to compl	INDI USA V. JOHNSON (DA) ste it accurately in an respects.
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.